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MUMTAZ SHEREEN SUHAIL

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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 MUMTAZ SHEREEN SUHAIL,

10 Plaintiff,

11 v.

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13 NAVIGANT INTERNATIONAL, INC.; TQ3
14 NAVIGANT; TQ3 TRAVEL SOLUTIONS;
and DOES 1 through 50, inclusive,

15 Defendants.
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Case No. C 06-03424 MHP

**STIPULATION AND PROPOSED ORDER
CONTINUING THE INITIAL CASE
MANAGEMENT CONFERENCE**

17 IT IS HEREBY STIPULATED AND AGREED UPON by the parties and their respective
18 counsel of record that the initial case management conference ("CMC") be continued from
19 November 27, 2006 until January 8, 2007 at 4:00 p.m. in Courtroom 15, 18th Floor, San
20 Francisco, California. The parties agree that the following constitutes good cause to continue the
21 initial CMC:

- 22 • The parties have been continuing substantial meet and confer efforts since the last
23 continuance of the Initial Case Management Conference in attempts to resolve
24 disputes by entering into a stipulation, which calls for amendment of the complaint
25 (including amending named defendants), dismissal without prejudice of certain
26 defendants, and a statute of limitations tolling agreement during the pendency of
27 this litigation. The parties have tentatively finalized a stipulation and the
28 stipulation is awaiting approval of defendant Navigant Southwest LLC.

- The parties request that the CMC be continued for 30 days, until the next available court date of January 8, 2007, to file the stipulation, amend the complaint, and to allow the amended defendant Navigant Southwest LLC to file an answer.
- The parties are not making this request for the purposes of any delay. Instead, the parties are making this request to avoid unnecessary motion practice, including motions to dismiss and/or summary judgment, that would unduly burden the Court with legal issues that are being resolved by the parties, including unnecessary attorneys' fees and costs in litigating this dispute.

SO STIPULATED.

Dated: November 20, 2006

KAHN BROWN & POORE LLP

By: 

David M. Poore
Attorneys for Plaintiff

Dated: November 20, 2006

MANATT PHELPS & PHILLIPS LLP

By: 

Andrew Satenberg
Attorneys for Defendants

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[PROPOSED] ORDER

IT IS SO ORDERED. The initial case management conference is continued from November 27, 2006, at 4:00 p.m. in Courtroom 15, 18th Floor, San Francisco, California, to January 8, 2007, at 4:00 p.m. in Courtroom 15, 18th Floor, San Francisco, California.

Dated: 11/27/06

